

**UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA  
CASE NO. 20-CV-954-UA-JLW**

FARHAD AZIMA,	)
	)
	)
Plaintiff,	)
	)
v.	)
	)
NICHOLAS DEL ROSSO and VITAL	)
MANAGEMENT SERVICES, INC.,	)
	)
Defendants.	)

**DECLARATION OF BRANDON S. NEUMAN  
IN SUPPORT OF DEFENDANTS' MOTION TO DISMISS  
PURSUANT TO RULE 12(b)(6)**

I, **Brandon S. Neuman**, pursuant to 28 U.S.C. § 1746, do hereby  
declare under penalty of perjury the following:

1. I am a partner of the law firm of Nelson Mullins Riley & Scarborough LLP ("Nelson Mullins"), GlenLake One, 4140 Parklake Avenue, Suite 200, Raleigh, North Carolina, 27612. I am a member in good standing of the Bars of the State of North Carolina, the State of California, and of this Court. Nelson Mullins is counsel to Defendants Nicholas Del Rosso and Vital Management Services, Inc., in this matter.

2. I attach hereto as **Exhibit 1** a true and correct copy of the Approved Judgment of the High Court of Justice Business and Property Courts

of England and Wales Business List (ChD) in Ras Al Khaimah Investment Authority v Farhad Azima, [2020] EWHC 1327 (Ch), dated May 22, 2020. The proceedings leading to this judgment (assigned claim number HC-2016-002798) are referred to herein as the “English Proceedings.”

3. I attach hereto as **Exhibit 2** a true and correct copy of the Approved Addendum to Judgment of the High Court of Justice Business and Property Courts of England and Wales Business List (ChD) in the English Proceedings (Ras Al Khaimah Investment Authority v Farhad Azima, [2020] EWHC 1686 (Ch)), dated June 30, 2020.

4. I attach hereto as **Exhibit 3** a true and correct copy of the Order of the High Court of Justice Business and Property Courts of England and Wales Business List (ChD) in the English Proceedings, dated July 31, 2020, ordering Farhad Azima to pay damages, interests, and costs to the Ras Al Khaimah Investment Authority.

5. I attach hereto as **Exhibit 4** a true and correct copy of the Complaint in *Azima v. RAK Inv. Auth.*, No. 16-CV-1948 (KBJ), Dkt. No. 1 (Sep. 30, 2016).

6. I attach hereto as **Exhibit 5** a true and correct copy of the First Amended Complaint in *Azima v. RAK Inv. Auth.*, No. 16-CV-1948 (KBJ), Dkt. No. 28 (May 16, 2017).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 21, 2020 in Raleigh, North Carolina.

A handwritten signature in black ink, consisting of several loops and a long horizontal stroke extending to the right.

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Brandon S. Neuman

## CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of December, 2020, I electronically filed the foregoing **Declaration of Brandon S. Neuman in Support of Defendants' Motion to Dismiss Pursuant to Rule 12(b)(6)** with the Clerk of the Court using the CM/ECF system, which will send electronic notification of filing to the following:

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